

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE BAYOU HEDGE FUND INVESTMENT : MDL No. 1755 (CM)
LITIGATION :
:

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THIS DOCUMENT RELATES TO:
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BROAD-BUSSEL FAMILY LIMITED :
PARTNERSHIP, MARIE LOUISE, :
MICHELSON, MICHELLE MICHELSON, and :
HERBERT BLAINE LAWSON, JR., Individually :
and on Behalf of All Other Persons and Entities :
Similarly Situated, :

Plaintiffs, :

- against - :

BAYOU GROUP LLC, et al., :

Defendants. :
:
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No. 06 Civ. 3026 (CM)

**NOTICE OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

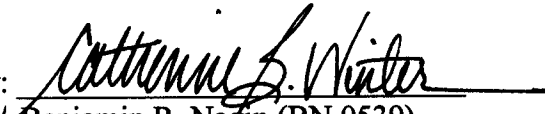
PLEASE TAKE NOTICE that, upon the annexed affidavits of Catherine B.

Winter and Mark B. Blocker, with exhibits annexed thereto, the undersigned will move this Court before the Honorable Colleen McMahon at the United States Courthouse, 300 Quarropas Street, White Plains, New York, at a date and time to be determined by the Court, for an order, pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York, granting Mark B. Blocker admission pro hac vice to the bar of this Court on behalf of defendant Citibank, N.A.

Dated: New York, New York
April 26, 2006

Respectfully submitted,

SIDLEY AUSTIN LLP

By: 
Benjamin R. Nagin (BN 0539)
Catherine B. Winter (CW 3053)
787 Seventh Avenue
New York, New York 10019
(212) 839-5300

Mark B. Blocker
Sidley Austin LLP
10 South Dearborn Street
Chicago, Illinois 60603
(312) 853-7000

John K. Van De Weert
Sidley Austin LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8000

Attorneys for Defendant Citibank, N.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HERBERT BLAINE LAWSON, JR., Individually :
and on Behalf of All Other Persons and Entities :
Similarly Situated, :

No. 06 Civ. 3026 (CM)

**AFFIDAVIT OF CATHERINE B.
WINTER**

Plaintiffs,

- against -

BAYOU GROUP LLC, et al.,

Defendants.
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STATE OF NEW YORK)
) s.s.:
COUNTY OF NEW YORK)

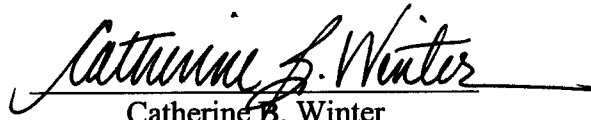
Catherine B. Winter, being duly sworn, hereby deposes and says:

1. I am an attorney admitted to practice in the state of New York and in this Court, and associated with the law firm of Sidley Austin LLP, counsel for defendant Citibank, N.A. ("Citibank") in this action. I respectfully submit this affidavit in support of Citibank's motion, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, for an order granting Mark B. Blocker admission pro hac vice to the bar of this Court on behalf of Citibank.

2. I am a member in good standing of the bar of this Court.

3. Mark B. Blocker is a member in good standing of the bar of the State of Illinois. Mr. Blocker's Affidavit, sworn to on April 25, 2006, with Certificate of Good Standing for the bar of the State of Illinois is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that this Court grant Citibank's motion for an order permitting Mark B. Blocker to appear in this action pro hac vice on behalf of Citibank.


Catherine B. Winter

Subscribed and sworn to before me
this 26th day of April, 2006


Notary Public

ERLINDA F. RABANO
Notary Public, State of New York
No. 01RA4998999
Qualified in Queens County
Certificate Filed in New York County
Commission Expires July 13, 2008

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BROAD-BUSSEL FAMILY LIMITED	:	No. 06 Civ. 3026 (CM)
PARTNERSHIP, MARIE LOUISE,	:	
MICHELSON, MICHELLE MICHELSON, and	:	AFFIDAVIT OF MARK B.
HERBERT BLAINE LAWSON, JR., Individually	:	<u>BLOCKER</u>
and on Behalf of All Other Persons and Entities	:	
Similarly Situated,	:	
	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
BAYOU GROUP LLC, et al.,	:	
	:	
Defendants.	:	
-----	X	
STATE OF ILLINOIS)	
) s.s.:	
COUNTY OF COOK)	

Mark B. Blocker, being duly sworn, hereby deposes and says:

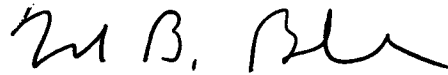
1. I am an attorney admitted to practice in the State of Illinois and a partner of the law firm of Sidley Austin LLP, counsel for defendant Citibank, N.A. ("Citibank") in this action.

2. I make this affidavit in support of Citibank's motion for an order permitting me to appear in this action as counsel on behalf of Citibank pro hac vice.

3. As shown in the Certificate of Good Standing annexed hereto as Exhibit 1,
I am a member in good standing of the Bar of the State Illinois.

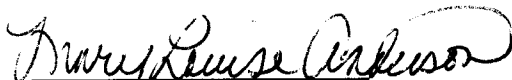
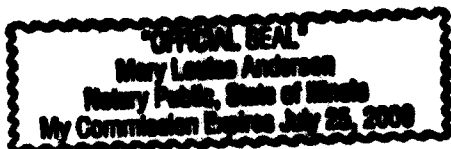
4. There are no pending disciplinary proceedings against me in any State or
Federal court.

5. Wherefore your affiant respectfully requests that he be permitted to appear
as counsel and advocate pro hac vice in this matter.



Mark B. Blocker

Subscribed and sworn to before me
this 25th day of April, 2006


Notary Public

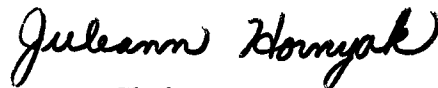
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Mark Bruce Blocker

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 10, 1988 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Monday, April 24, 2006.



Clerk